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7	Attorneys for Anthony Sullivan			
8				
9	DISTRICT OF NEVADA			
10				
11	UNITED STATES OF AMERICA,) CASE NO. 2:20-CR-00298-GMN-EJY		
12	Plaintiff,) CASE NO. 2:20-CR-00299-GMN-EJY		
	VS.) CASE NO. 2.20-CR-00277-GWIN-EJ I		
13	ANTHONY SULLIVAN,			
14	Defendant.			
15		_)		
16	STIPULATION TO CONTINUE SENTENCING HEARING (First Request)			
17				
18	IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by			
19	and through its attorney, CHRISTOPHER CHIOU, Acting United States Attorney, through			
20	KIMBERLY ANNE SOKOLICH, Assistant United States Attorney; and Defendant ANTHONY			
21	SULLIVAN, by and through his counsel, RUSSELL E. MARSH, ESQUIRE and SUNETHRA			
22	MURALIDHARA, ESQUIRE, Wright Marsh & Levy, that the sentencing hearing currently			
23	scheduled for September 29, 2021, at 10:00 a.m. be vacated and set to a date and time convenien			
24	to this Court, but no sooner than one hundred twenty (120) days from the current sentencing date			
25	This stipulation is entered into for the following reasons:			
26	1. The parties need additional	time to prepare for Defendant Anthony Sullivan's		
27	sentencing hearing. On June 30, 2021 a Cha	nge of Plea was held in case 2:20-cr-00298-GMN-EJY		

28 (ECF 68) and 2:20-cr-00299-GMN-EJY (ECF 39).

1	2. The parties agree to the continuance. Mr. Sullivan is currently on pretrial release and			
2	agrees to the continuance.			
3	3.	Additionally, denial of this request for continuance could result in a miscarriage of		
4	justice.			
5	4.	The additional time requested by this Stipulation is made in good faith and not for		
6	purposes of	purposes of delay.		
7	5.	This is the first request for a co	ontinuance of the sentencing hearing.	
8	Dated this 17th day of September, 2021.			
9	Respectfully submitted:			
10	WRIGHT M	ARSH & LEVY	CHRISTOPHER CHIOU ACTING UNITED STATES ATTORNEY	
11			ACTING UNITED STATES ATTORNET	
12	BY_/s/ Russell E. Marsh RUSSELL E. MARSH, ESQUIRE SUNETHRA MURALIDHARA Attorneys for Anthony Sullivan		BY /s/Kimberly Anne Sokolich KIMBERLY ANNE SOKOLICH	
13			Assistant U.S. Attorney	
14	Attorneys	Tor Anthony Sumvan		
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1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 4 UNITED STATES OF AMERICA, 5 CASE NO. 2:20-CR-00298-GMN-EJY Plaintiff, CASE NO. 2:20-CR-00299-GMN-EJY 6 VS. 7 ANTHONY SULLIVAN, 8 Defendant. 9 10 Pursuant to the Stipulation of the Parties and for good cause appearing the sentencing hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh 11 12 the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein 13 14 sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for 15 sentencing, taking into account the exercise of due diligence. 16 IS IT HEREBY ORDERED that the sentencing in the above-captioned matter currently scheduled for September 29, 2021, at 10:00 a.m., be vacated and continued to Wednesday, 17 18 February 2, 2022, at 10:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro. 19 DATED: Sept. 20, 2021 20 21 GLØRIA M. NAVARRO United States District Judge 22 23 24 25 26 27 28